

# EXHIBIT L



**JEFFREY FRIEDLANDER**  
*Acting Corporation Counsel*

**THE CITY OF NEW YORK**  
**LAW DEPARTMENT**  
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NEW YORK, NY 10007

**RYAN G. SHAFFER**  
Assistant Corporation Counsel  
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January 30, 2014

**BY HAND DELIVERY**

Nathaniel Smith  
*Attorney for Plaintiff*  
111 Broadway, Suite 1305  
New York, New York 10006

Dear Mr. Smith:

As you are aware the Honorable Judge Sweet has allowed City Defendants to depose plaintiff for an additional day in order to ask plaintiff whether he shared a letter written by him to prior counsel with any third parties. Please find attached a notice for that deposition to occur on Wednesday February 19, 2014. If plaintiff would rather not appear for another day of deposition testimony City Defendants are willing to forego the deposition, and would accept instead plaintiff's sworn, notarized affidavit, as annexed hereto. If City Defendants do not receive the signed affidavit by February 12, 2014, the deposition will take place at 100 Church Street on February 19, 2014.

Thank you for your attention to this matter.

Sincerely,  
A handwritten signature in black ink, appearing to read "Ryan G. Shaffer".  
Ryan G. Shaffer  
Assistant Corporation Counsel

cc: Gregory John Radomisli (By Hand Delivery)  
MARTIN CLEARWATER & BELL LLP  
*Attorneys for Jamaica Hospital Medical Center*  
220 East 42nd Street 13th Floor  
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Brian Lee (By Hand Delivery)  
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Walter A. Kretz , Jr. (By Hand Delivery)  
SCOPPETTA SEIFF KRETZ & ABERCROMBIE  
*Attorney for Defendant Mauriello*  
444 Madison Avenue, 30th Floor  
New York, NY 10022

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

x

## ADRIAN SCHOOLCRAFT,

Plaintiff,

## NOTICE OF DEPOSITION

-against-

10 Civ. 6005 (RWS)

THE CITY OF NEW YORK, ET AL.

## Defendants.

x

PLEASE TAKE NOTICE that pursuant to the Order of United States District Judge Robert W. Sweet and Rule 30 of the Federal Rules of Civil Procedure, City Defendants will take the continued deposition of **ADRIAN SCHOOLCRAFT**, before a notary public or other officer authorized by law to administer oaths, at the offices of the New York City Corporation Counsel, located at, 100 Church Street, New York, New York, on February 19, 2014 beginning at 10:00 a.m., and continuing from day to day thereafter, until concluded. The deposition will be recorded by video and stenographic means.

Dated: New York, New York  
January 30, 2014

JEFFREY D. FRIEDLANDER  
Acting Corporation Counsel of the City of New York  
*Attorney for City Defendants*  
100 Church Street  
New York, New York 10007  
Tel: (212) 356-2386  
Fax: (212) 356-3609

By

Ryan G. Shaffer  
Assistant Corporation Counsel  
Special Federal Litigation Division

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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ADRIAN SCHOOLCRAFT,

Plaintiff,

**AFFIDAVIT OF  
ADRIAN SCHOOLCRAFT**

-against-

10 CV 6005 (RWS)

THE CITY OF NEW YORK, et al.,

Defendants.

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STATE OF NEW YORK )  
: SS.:  
COUNTY OF )

Adrian Schoolcraft, being duly sworn, hereby states, under penalty of perjury and pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am the plaintiff in this matter. I make this declaration based upon my personal knowledge.
2. By letter dated January 30, 2014, counsel for defendant City of New York, requested that the plaintiff provide an affidavit attesting to the fact that he never sent any letters (including but not limited to any letters referenced in "The NYPD Tapes" at p.240) concerning firing his prior counsel to any third party, including but not limited to Leonard Levitt and/or Graham Rayman.
3. I did not provide, show, or otherwise disseminate any letters (including but not limited to any letters referenced in "The NYPD Tapes" at p.240) concerning firing my prior counsel to any third party, including but not limited to Leonard Levitt and/or Graham Rayman, or any media outlet, including but not limited to newspapers, magazines, blogs, or television

networks, and I do not know or have any knowledge whatsoever about whether anyone may have done so.

4. I did not provide, show, or otherwise disseminate any letters (including but not limited to any letters referenced in "The NYPD Tapes" at p.240) concerning firing my prior counsel to my father, Larry Schoolcraft, or any family members and I do not know or have any knowledge whatsoever about whether anyone may have done so.
5. I do not know or have any knowledge whatsoever about who provided either Graham Rayman, Leonard Levitt, or the Village Voice any letters (including but not limited to any letters referenced in "The NYPD Tapes" at p.240) concerning firing my prior counsel.

Dated:

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Adrian Schoolcraft

Sworn to before me this \_\_\_\_\_ day  
of \_\_\_\_\_, 2014

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NOTARY PUBLIC